



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE MORROW LACKNER,

Defendant.

CR 2:22-cr-00603-DSF

I N D I C T M E N T

[18 U.S.C. §§ 2261A(2) (A), (B),
2261(b) (5): Stalking]

The Grand Jury charges:

[18 U.S.C. §§ 2261A(2) (A), (B), 2261(b) (5)]

1. Beginning in or around June 2021, and continuing to at least on or about October 17, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANDRE MORROW LACKNER, with the intent to harass and intimidate Victim 1, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, cellular telephone networks, email, interstate wires, and the Internet, to engage in a course of conduct, described in paragraph 2 below, that placed Victim 1 in reasonable fear of death and serious bodily injury

1 to herself or an immediate family member, and caused, attempted to
2 cause, and would reasonably be expected to cause substantial
3 emotional distress to Victim 1 and immediate family members of Victim
4 1.

5 2. Defendant LACKNER's course of conduct included, among other
6 things, the following:

7 a. On or about June 13, 2021, defendant LACKNER sent the
8 following text messages to Victim 1, which stated:

9 *Sometimes I wonder if The World is trying to turn me into a*
10 *murderer*

11 *So since everyone cuts me off and treats me like they don't*
12 *exist, maybe I am meant to give this world a message no one is*
able to ignore

13 *I feel like the only choice in life left, after I lose my mom,*
14 *is to either shoot myself or take a lot of people with me*
because I'll never have friends again.

15 b. Also on or about June 13, 2021, after Victim 1 sent
16 defendant LACKNER messages encouraging him to seek help, and
17 indicating that if she received any similar messages from defendant
18 LACKNER going forward, she would report them out of concern for
19 defendant LACKNER's safety and the safety of those around him,
20 defendant LACKNER sent Victim 1 the following text messages, which
21 stated:

22 *Well I am being watched and have gotten the legal trouble*
23 *before, so being report would probably result in jail time for*
24 *me*

25 *But knowing you are this eager to get me thrown in the slammer,*
26 *just reinforces my belief that people hate me*

27 c. On or about August 14, 2021, after Victim 1 rejected
28 defendant LACKNER's request to meet up in person, defendant LACKNER

1 sent Victim 1 several text messages to which Victim 1 did not
2 respond, including the following:

3 . . . you're not the only Jew friend that's been fake to me and
4 cut me off Not everyone can live up to Jewish standards
5 because we don't have the same cultural background or advantages
6 in society.

7 Delete my number and block me. Fuck pen pal bullshit. Hit me up
8 for the threesome if u change ur mind. peace [peace emoji]

9 d. On or about October 31, 2021, defendant LACKNER sent
10 numerous text messages to Victim 1 to which Victim 1 did not respond,
11 including the following:

12 All the kikes cut me off. The Jew has no tolerance towards other
13 people that don't have the similar upbringing as them.

14 The Jews love gravitating towards black entertainers so they can
15 use them with their own selfish intentions, even if it's just to
16 be entertained. But at the end of the day these parasites are
17 only pursuing Zionist and Jewish interests

18 The Asians are even worse, we need to start more Asian hate and
19 wipe these alien gooks off the planet too

20 Chinks and kikes are the only true protected groups. You can say
21 whatever you want about niggers and wetbacks nobody cares, but
22 dare speak up about chang or shalom and youre cancelled

23 I'm tired of kikes putting me down all the time. Maybe Hitler
24 was on to something. You guys pretend to be multicultural so you
25 can get more power, you masquerade as people of color but at the
26 end of the day you were only concerned about jews, just like the
27 groups who claim to be people of color that once they get into a
28 favorable position they immediately discriminate against other
minorities

I honestly wish I never went to Smc and didn't have to be around
the sheltered Jews that grew up with easy and safe lives, I
should've stayed with my own ghetto trash nigger kind. The Jews
and Chinks own everything in LA and I will never be accepted by
them, The Jews and Chinks own all the digital platforms where
they spread hate speech and censor black people. Facey non-Jews
as objects to be used. They must go.

1 *And I wish these anne franks would stop fetishizing black men*
2 *and seeing us as sexual objects, because at the end of the day*
3 *you will never marry outside of Jewish anyway*

4 e. On or about January 22, 2022, defendant LACKNER sent
5 three text messages to Victim 1 to which Victim 1 did not respond,
6 stating:

7 *I wish I could walk all these kikes to the gas chamber myself*

8 *Why do the Hebrew think that just because money is involved they*
9 *have the right to be arrogant nasty and disrespectful towards*
10 *everyone else in the workplace? I realize I don't hate white*
11 *people as much as the Jews, it's the Jews that have been*
12 *extremely rude and down pudding [sic]. You guys think you are*
13 *better than everyone else and talk down to everyone. You have*
14 *zero tolerance towards anyone who doesn't fit your cultural*
15 *standards. That's why you need to be walked back to the gas*
16 *chamber where you belong.*

17 *And you pretend to be anti-racist because you know that you are*
18 *a minority yourself, but I see through your bullshit, and I want*
19 *to see every single Jew exterminated from this earth*

20 f. On or about March 7, 2022, defendant LACKNER sent the
21 following text message to Victim 1, to which Victim 1 did not
22 respond:

23 *Remember, Hitler was right about the kikes.*

24 g. On or about March 8, 2022, defendant LACKNER sent the
25 following text message to Victim 1, to which Victim 1 did not
26 respond:

27 *Hey Jude*

28 h. On or about August 7, 2022, defendant LACKNER sent the
29 following text messages to Victim 1, to which Victim 1 did not
30 respond:

31 *Would you like to celebrate the next synagogue shooting?*

32 *I used to hate white people until I realize the people who have*
33 *been nasty in disrespectful To me all these years weren't white,*

they were Jewish. I sympathize more with neo-Nazis now because I understand that they were right

i. On or about October 17, 2022, defendant LACKNER sent the following email to Victim 1, to which Victim 1 did not respond:

The more I learn about Jews and realize most of the disrespect, mistreatment, racism, and humiliation I received in my life wasn't from whites, but from Jews. I mistook you as the same race and realized it's the Jews who have caused most of the problems in my life and in the world today. You see us black people as your pets, your cattle to fetishize. That's why you had no problem putting me down for being poor and growing up in the ghetto Putting me down for not having a privileged Jew job. Putting me down for not growing up on the westside and have all society cater to me for being Jewish.

Hitler was right about you people. The holocaust never happened.
And if it did, you deserved it.

I will make sure I kill a Jew before I leave this earth.

A TRUE BILL

/s/
Foreperson

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